

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Roanoke Division**

VINCENT WOODHOUSE,

Plaintiff,

v.

CIVIL ACTION NO. 7:20cv655

MAJOR KING, *et al.*,

Defendants.

DEFENDANT KING'S RESPONSE TO ECF No. 58

Upon review of the casefile in this matter, undersigned Counsel for Defendant King cannot find any record that Plaintiff was sent Defendant King's responses to Plaintiff's Request for Admissions # 1 through 4 (ECF No. 39) in accordance with this Court's Order dated March 3, 2023 (ECF No. 48). Undersigned counsel for Defendant King apologizes for this administrative oversight and will promptly send Plaintiff's counsel of record a copy of Defendant King's responses to requests # 1 through 4 and file a letter of compliance with this Court within the next to two business days, on or before December 15, 2023.

Undersigned counsel has the utmost respect for this Court and asserts that this oversight was inadvertent and an uncommon occurrence.

As Plaintiff is now represented by counsel, and the trial in this matter is more than eight months away and not set to commence until July 17, 2023, any delay caused by Undersigned counsel's error will work no prejudice to Plaintiff. Undersigned counsel for Defendant King therefore respectfully requests that upon the filing of a letter of compliance on or before December 15, 2023, this Court will deny Plaintiff's *pro se* filed Request for Sanctions (ECF No. 58).

Respectfully submitted,

MAJOR KING

By: s/ Laura H. Cahill
Laura H. Cahill, AAG, VSB#86328
Office of the Attorney General
Criminal Justice & Public Safety Division
202 North 9th Street
Richmond, Virginia 23219
(804) 786-5630
(804) 786-4239 (Fax)
Email: lcahill@oag.state.va.us

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of December 13, 2023 I electronically filed the foregoing Defendant King's Response ECF No. 58 with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following CM/ECF participants:

Harmony Iris Loubé
Steptoe & Johnson
1330 Connecticut Avenue, NW
Washington, DC 20036
443-975-2753
Email: hjones@steptoe.com
Counsel for Plaintiff

and I hereby certify that a courtesy copy was sent by the United States Postal Service to the following non-CM/ECF participant:

VADOC Centralized Mail Distribution Center
Vincent Woodhouse, # 1031027
3521 Woods Way
State Farm, Virginia 23160

s/ Laura H. Cahill
Laura H. Cahill, AAG, VSB#86328
Counsel for Defendant King